Mr. Peter Maggiore Cabinet Secretary New Mexico Environment Department Harold Runnels Building 1190 St. Francis Drive Santa Fe, New Mexico 87505



Sandia National Laboratories' proposed plan to leave the Mixed Waste Landfill in place is recognized as scientifically sound and appropriate by the Rio Grande Chapter of the Health Physics Society *.

None of the extensive available data indicate that the integrity of the Mixed-Waste Landfill of the Sandia National Laboratory has been compromised. It is reasonable to conclude that immediate or short-term risk to the groundwater 500 feet below the landfill is negligible. In addition, no mechanisms that could indicate the possibility of a long-term threat of groundwater contamination have been demonstrated. The existing network of monitoring wells provides adequate long-term monitoring that would warn in a timely fashion if the situation were to change. Changes in groundwater activity, as indicated by measurements from these monitoring wells, would indicate the need for re-evaluation.

Consequently, sampling activities can safely be limited to the monitoring activities already planned, with a protective soil cover added for additional safety, and monitoring in the future as determined necessary in the Long-Term Stewardship Plan.

The excavation of the Mixed Waste Landfill poses a greater risk than leaving the material in place and capping. There are two main reasons for this statement. First, excavation and transfer to another place could mobilize and suspend some of the toxic and radioactive components in the air, even under the strictest abatement practices. Once airborne, these agents could lead to an inhalation and ingestion risk that is much larger than the risk of leaving the waste in place. Second, remediation workers would be exposed to radiation hazards during the excavation and transfer of the landfill contents. At some future date, 30 or 40 years from today, after the short-lived radionuclides have decayed to safer levels, the situation can be re-evaluated.

In summary, evaluation of the available information regarding Sandia's Mixed Waste Landfill leads to the following conclusions:

- public calls for excavation of the site are scientifically unjustified and are not supported by the available data,
- the data indicates that the site is well-characterized and that long-term stewardship plans represent a lower risk to the public than short-term excavation, and
- the health and safety of residents of the State of New Mexico remain adequately protected.
- * The Rio Grande Chapter of the Health Physics Society has over 200 Members from throughout New Mexico and is part of an international society that consists of over 6000 members. The society is a non-profit scientific professional organization whose mission is to promote the practice of radiation safety. Contacts for the Rio Grande Chapter may be found at: http://www.hps.org/rgchps/.

Sincerely,

Randell L. Salver

President, Rio Grande Chapter Health Physics Society

PO Box 37392

Albuquerque, NM 87176